

## KIRKLAND & ELLIS LLP

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July 25, 2025

### VIA ECF

Hon. Rukhsanah L. Singh  
United States Magistrate Judge  
United States District Court,  
District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street Trenton, NJ 08608

Re: *In re Johnson & Johnson Talcum Powder Products Marketing, Sales Practices and Products Liability Litigation*, MDL No. 2738  
**Appointment of Plaintiffs' Lead Negotiation Counsel**

Dear Judge Singh:

I write on behalf of Defendants in response to (1) the Plaintiffs' Steering Committee's Proposal Regarding Plaintiffs' Lead Negotiation Counsel (ECF No. 40696) and (2) the applications or letters of Christopher Placitella, R Bryant McCulley, and Hunter Shkolnik seeking to become members of a "negotiation committee" (ECF Nos. 40697-98; 40735).

#### **1. Plaintiffs' Steering Committee's Proposal Regarding Plaintiffs' Lead Negotiation Counsel (ECF No. 40696)**

Defendants do not object to the Plaintiffs' Steering Committee's proposal that Christopher Seeger serve as Plaintiffs' Lead Negotiation Counsel. Defendants also re-confirm that Jim Murdica is lead settlement counsel for Defendants.

#### **2. Applications To Be Members Of A "Negotiation Committee" (ECF Nos. 40697-98; 40735).**

This Court ordered Plaintiffs to propose "*a* Plaintiffs' Lead Negotiation Counsel" to have "authority to conduct settlement negotiations and to participate in mediations and/or settlement conference regarding this MDL on behalf of Plaintiffs." ECF No. 40326 (emphasis added). In short, the Court ordered Plaintiffs to identify a single individual, not four. Defendants object to a

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larger committee. It is unnecessary and counterproductive to need to negotiate with four different attorneys simultaneously—with two being “Co-Lead.”

Defendants therefore object to the applications of Christopher Placitella, R Bryant McCulley, and Hunter Shkolnik as members of a “negotiation committee” that this Court never ordered created in the first place.

Sincerely,



Kristen Renee Fournier, Esq.

cc: All counsel of record via ECF